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REMARKS

Claims 1-4, 7, 8, 11, 24, 25, 28-30, and 32 were rejected under 35 U.S.C. §102(e) as being anticipated by Miyake (US 7,110,033). Claims 5, 6, 19-23, 31 and 33-38 were rejected under 35 U.S.C. §103(a) as being unpatentable over Miyake (US 7,110,033) in view of Miyake (US 6,836,669). Claims 9 and 12-18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Miyake (US 7,110,033) in view of Harazono (US 7,029,186). Claims 10, 26, and 27 were rejected under 35 U.S.C. §103(a) as being unpatentable over Miyake (US 7,110,033) in view of Nishio (US 7,077,663). The examiner is requested to reconsider these rejections.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). It is submitted that Miyake fails to teach each and every element as set forth in claims 1 and 24 for at least the reasons described below.

Applicants have amended claim 1 to recite, *inter alia*, "wherein the majority of the height of the camera is greater than a height of the electrical connector". Miyake discloses an imaging element 2, a substrate 28, and a socket component 29. The substrate 28 includes a circuit pattern 28a formed on a side thereof. The socket component 29 comprises an opening section 29b. The socket component 29 has a circuit pattern 29a which enables electrical connection with the circuit pattern 28a when the substrate 28 constituting the imaging

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device is fitted into the socket component 29 (see col. 26 lines 6-9). More specifically, "the opening section 29b is for fitting the substrate 28 into the socket component 29 (see col. 26, lines 55-56). Additionally, the examiner states "that the structure of the camera in Miyake allows the camera to be slid **into the connector** at one of a plurality of different heights since the connectors 28a extend along the majority of the casing of said camera, providing connection at any position where the camera is **positioned inside the connector**". This is achieved by providing the substrate 28 and circuit pattern 28a that have an overall height less than the socket component 29 (see Fig. 64). Thus the majority of the height of the camera is less than the height of the socket component.

Applicants' claimed invention claims a stepless movement height connection which allows positioning of the camera at one of a plurality of different heights, wherein the plurality of different heights extends along a majority of a height of the camera, and wherein the majority of the height of the camera is greater than a height of the electrical connector. Therefore, the plurality of different heights extends along a distance greater than the height of the electrical connector.

The height of applicants' claimed stepless movement height connection is significant as this provides for the connection to extend between distances greater than the height of the connector. This allows for the camera to be fitted at the various heights 87, 88, 89 (see Figs. 9-11) with respect to the printed wiring board. This allows for applicants' claimed invention to perform differently when compared to the

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disclosure of Miyake which only allows for a single height (within the socket component 29) when the substrate 28 is fitted into the socket component 29 (see col. 26, lines 27-28) and mounted to the main substrate 30 (see Fig. 67 and col. 26, lines 31-32).

There is no teaching or suggestion in Miyake to provide a stepless movement height connection which extends beyond a height of the socket component 29. Thus, Miyake fails to teach a stepless movement height connection which allows the camera to slide relative to the electrical connector along a first axis to allow positioning of the camera relative to the electrical connector at one of a plurality of different heights along the first axis, wherein the plurality of different heights extends along a majority of a height of the camera and wherein the majority of the height of the camera is greater than a height of the electrical connector, as claimed in amended claim 1. Accordingly, claim 1 is distinct and patentable over the art of record and should be allowed.

Though dependent claims 2-11 contain their own allowable subject matter, these claims should at least be allowable due to their dependence from allowable claim 1. However, to expedite prosecution at this time, no further comment will be made.

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).

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Applicants have amended claim 12 to recite, *inter alia*, "wherein a height of the electrical conductors along the first lateral side of the housing is sized and shaped to be greater than a height of the electrical connector when the camera is connected to the electrical connector". Similar to the arguments presented above with respect to claim 1, Miyake discloses the circuit pattern 28a formed on a side of the substrate 29. The socket component 29 has a circuit pattern 29a which enables electrical connection with the circuit pattern 28a when the substrate 28 constituting the imaging device is fitted into the socket component 29 (see col. 26 lines 6-9). The circuit pattern 28a has an overall height less than the height of the socket component 29 (see Fig. 64). There is no disclosure or suggestion in Miyake to provide a circuit pattern having a height greater than the socket component 29. Additionally, the examiner admits that Miyake does not teach or disclose a camera printed wiring board stationarily connected to the rear end of the housing. The examiner states that Harazono teaches "a camera printed wiring board (Fig. 8: 13)". Applicants submit that there is no element "13" illustrated in Fig. 8. Therefore applicants request clarification of this rejection. Neither Miyake nor Harazono teach or suggest electrical conductors which extend along a rear end of the housing and along a first lateral side of the housing wherein a height of the electrical conductors along the first lateral side of the housing is sized and shaped to be greater than a height of the electrical connector when the camera is connected to the electrical connector ... and a camera printed wiring board stationarily connected to

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the rear end of the housing and coupled to the electrical conductors as claimed in applicants' claimed invention.

Additionally, applicants submit that there is no suggestion to combine the references as the examiner is attempting to do (at least not until after reading applicants' patent application). In particular, Harazono teaches that "the printed circuit board is connected by using solder 114 through the printed wiring pattern 105 formed of the leg portion 101A, to a main board 113" (see col. 1, lines 46-48). In other words, the wiring pattern 105 is not configured to be removably connected to contacts of an electrical connector (as claimed in applicants' claimed invention), as the imaging apparatus is connected directly to a circuit board and not to a receiving connector.

Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. (see MPEP 2143.01, page 2100-98, column 1). The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination (see MPEP 2143.01, page 2100-98, column 2). A statement that modifications of the prior art to meet the claimed invention would have been "well within the ordinary skill of the art at the time the claimed invention was made" because the references relied upon teach that all aspects of the claimed invention were individually known in the art is **not sufficient**

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to establish a *prima facie* case of obviousness without some objective reason to combine the teachings of the references. (see MPEP 2143.01, page 2100-99, column 1) Ex parte Levengood, 28 USPQ2d 1300 (Bd. Pat. App. & Inter. 1993). >See also Al-Site Corp. v. VSI Int'l Inc., 174 F.3d 1308, 50 USPQ2d 1161 (Fed. Cir. 1999) (The level of skill in the art cannot be relied upon to provide the suggestion to combine references.)

In the present case, there is no teaching, suggestion, or motivation, found in either the references themselves or in the knowledge generally available to one of ordinary skill in the art, to provide electrical conductors which extend along a rear end of the housing and along a first lateral side of the housing wherein a height of the electrical conductors along the first lateral side of the housing is sized and shaped to be greater than a height of the electrical connector when the camera is connected to the electrical connector ... and a camera printed wiring board stationarily connected to the rear end of the housing and coupled to the electrical conductors, as claimed in amended claim 12. The features of claim 12 are not disclosed or suggested in the art of record. Therefore, claim 12 is patentable and should be allowed.

Though dependent claims 13-18 contain their own allowable subject matter, these claims should at least be allowable due to their dependence from allowable claim 12. However, to expedite prosecution at this time, no further comment will be made.

Applicants have amended claim 19 to recite, *inter alia*, "wherein a height of the camera receiving area is sized and

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shaped to be less than the majority of the height of the camera when the camera is received in the camera receiving area". Similar to the arguments presented above with respect to claim 1, Miyake (US 7,029,186) discloses an imaging element 2, a substrate 28, and a socket component 29. The substrate 28 includes a circuit pattern 28a formed on a side thereof. The socket component 29 comprises an opening section 29b. The socket component 29 has a circuit pattern 29a which enables electrical connection with the circuit pattern 28a when the substrate 28 constituting the imaging device is fitted into the socket component 29 (see col. 26 lines 6-9). This is achieved by providing the socket component 29 that has an overall height greater than the substrate 28 and circuit pattern 28a (see Fig. 64). Thus the height of the opening section 29b is greater than the height of the circuit pattern 28a. Miyake (US 6,836,669) discloses a portable telephone comprising an image pick up device 1 and a circuit board 2. Lead portions 104 are attached between the image pick up device 1 and the circuit board 2. The lead portions 104 extend from a single location along the sides of the image pick up device 1 (see Figs. 1, 2A, and 2B). There is no disclosure or suggestion in Miyake (US 6,836,669) to provide electrical contact at one of a plurality of different locations along a majority of a height of the image pick up device 1 inside the opening 201. Neither Miyake (US 7,110,033) nor Miyake (US 6,836,669) teach or suggest a camera receiving area adapted to receive a camera therein and make electrical contact at one of a plurality of different locations along a majority of a height of the camera inside the camera receiving area wherein a height of the camera

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receiving area is sized and shaped to be less than the majority of the height of the camera when the camera is received in the camera receiving area, as claimed in applicants' claimed invention.

Additionally, applicants submit that there is no suggestion to combine the references as the examiner is attempting to do (at least not until after reading applicants' patent application). In the present case, there is no teaching, suggestion, or motivation, found in either the references themselves or in the knowledge generally available to one of ordinary skill in the art, to provide a camera electrical connector comprising a camera receiving area adapted to receive a camera therein and make electrical contact at one of a plurality of different locations along a majority of a height of the camera inside the camera receiving area, wherein a height of the camera receiving area is sized and shaped to be less than the majority of the height of the camera when the camera is received in the camera receiving area. The height of camera receiving area with respect to the height of the camera is significant as this provides for the camera electrical connector to extend between greater distances than those possible in prior art configurations. This allows for the camera to be fitted at the various heights 87, 88, 89 (see Figs. 9-11) with respect to the printed wiring board. This allows for applicants' claimed invention to perform differently when compared to the disclosures of Miyake (US 7,110,033) and Miyake (US 6,836,669) which only allow for an electrical connection at a single height. The features of



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claim 19 are not disclosed or suggested in the art of record. Therefore, claim 19 is patentable and should be allowed.

Though dependent claims 20-23 contain their own allowable subject matter, these claims should at least be allowable due to their dependence from allowable claim 19. However, to expedite prosecution at this time, no further comment will be made.

Applicants have amended claim 24 to recite, *inter alia*, "wherein the housing comprises a plastic material, wherein the camera comprises electrical conductors on the housing, wherein the electrical conductors directly contact electrical contacts of the electrical connector". Miyake discloses an imaging element 2, a substrate 28, and a socket component 29. The substrate 28 includes a circuit pattern 28a formed on a side thereof. The socket component 29 comprises an opening section 29b. The socket component 29 has a circuit pattern 29a which enables electrical connection with the circuit pattern 28a when the substrate 28 constituting the imaging device is fitted into the socket component 29 (see col. 26 lines 6-9). There is no disclosure or suggestion in Miyake to provide the circuit pattern 28a on the imaging element 2. Additionally, Miyake does not teach that the housing of the imaging element 2 comprises a plastic material. Thus Miyake does not teach or suggest a camera housing comprising a plastic material, wherein the camera comprises electrical conductors on the housing, and wherein the electrical conductors directly contact electrical contacts of the electrical connector, as claimed in applicants' claimed invention. The features of

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claim 24 are not disclosed or suggested in the art of record. Therefore, claim 24 is patentable and should be allowed.

Though dependent claims 25-32 contain their own allowable subject matter, these claims should at least be allowable due to their dependence from allowable claim 24. However, to expedite prosecution at this time, no further comment will be made.

Applicants have amended claim 33 to recite, *inter alia*, "wherein a height of the electrical conductors extending along the majority of the height of the first lateral side of the camera is greater than a height of the electrical connector". Similar to the arguments above with respect to claim 19, neither Miyake (US 7,110,033) nor Miyake (US 6,836,669) teach or suggest the features or method of claim 33. Therefore, claim 33 is patentable and should be allowed.

Though dependent claims 34-36 contain their own allowable subject matter, these claims should at least be allowable due to their dependence from allowable claim 33. However, to expedite prosecution at this time, no further comment will be made.

Applicants have amended claim 37 to recite, *inter alia*, "wherein the stepless movable height connection comprises a first portion connected to the device printed wiring board and a second portion connected to the camera ... and wherein the majority of the height of the camera is greater than a height of the first portion". Similar to the arguments above with respect to claim 19, neither Miyake (US 7,110,033) nor Miyake

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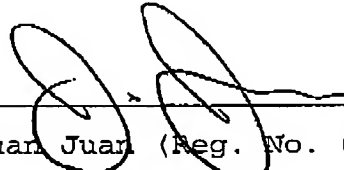
(US 6,836,669) teach or suggest the features of claim 37. Therefore, claim 37 is patentable and should be allowed.

Though dependent claim 38 contains allowable subject matter, this claim should at least be allowable due to its dependence from allowable claim 37. However, to expedite prosecution at this time, no further comment will be made.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issue remain, the examiner is invited to call applicants' attorney at the telephone number indicated below.

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Respectfully submitted,

  
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